

**THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ANGELA BROWN, *et al.*

Plaintiffs,

v.

PEREGRINE ENTERPRISES, INC.  
dba RICK'S CABARET NEW  
YORK, a New York corporation; RCI  
ENTERTAINMENT (NEW YORK)  
INC., a New York corporation; RCI  
HOSPITALITY HOLDINGS, INC.  
fka RICK'S CABARETI  
INTERNATIONAL, INC., a Texas  
corporation; RCI MANAGEMENT  
SERVICES, a Texas corporation;  
ERIC LANGAN, an individual; ED  
ANAKAR, an individual; DOE  
MANAGERS 1-3; and DOES 4-10,  
inclusive,

Defendants.

**Case No.: 1:22-cv-01455-KPF**

**COLLECTIVE ACTION**

**PLAINTIFF GISELLE LUZA'S  
NOTICE OF LODGING  
JUDGMENT AFTER  
ACCEPTANCE OF  
DEFENDANTS' OFFER OF  
JUDGMENT PURSUANT TO  
FEDERAL RULE OF CIVIL  
PROCEDURE 68**

**COMES NOW** plaintiff Giselle Luza (“Plaintiff” or “Ms. Luza”) by and through undersigned counsel, and submits this Notice of Lodging Re: Proposed Judgment pursuant to the Notice of Acceptance filed on April 7, 2023.

Respectfully Submitted,

Dated: April 7, 2023

**CARPENTER & ZUCKERMAN**

*/s/ John P. Kristensen*

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John P. Kristensen (*Pro Hac Vice*)  
Frank M. Mihalic, Jr. (*Pro Hac Vice*)  
Justice D. Turner (*Pro Hac Vice*)

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I certify that on Friday, April 07, 2023 a true and correct copy of the attached

**PLAINTIFF GISELLE LUZA'S NOTICE OF LODGING AND PROPOSED JUDGMENT  
REGARDING DEFENDANTS' OFFER OF JUDGMENT PURSUANT TO FEDERAL  
RULE OF CIVIL PROCEDURE 68** was served via CM/ECF upon the following parties  
pursuant to Rule 5 of the Federal Rules of Civil Procedure:

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*Counsel for Defendants*

*/s/ Frank M. Mihalic, Jr.*

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Frank M. Mihalic, Jr.